DOCUMENT RESUME

ED 165 822 JC 790 080

TITLE	The 1978 CETA Act: How AACJC Can Participate.
INSTITUTION	American Association of Community and Junior Colleges, Washington, D.C. Office of Governmental Affairs.
PUB DATE	10 Jan 79
NOTE	34p.; Pages 31-54 of the original document containing pages 59141-59164 of Federal Register, vol. 43, no. 244--Tuesday, December 19, 1978--have been deleted due to irreproducibility
AVAILABLE FROM	American Association of Community and Junior Colleges, One Dupont Circle, N. W., Suite 410, Washington, D.C. 20036
EDRS PRICE	MF-$0.83 Plus Postage. HC Not Available from EDRS.
DESCRIPTORS	College Programs; College Role; Community Colleges; Contracts; Employment Opportunities; *Employment Programs; *Federal Aid; Federal Legislation; *Federal Programs; Fund Raising; Government School Relationship; Interagency Coordination; *Job Training; *Junior Colleges; Unemployed
IDENTIFIERS	*Comprehensive Employment and Training Act

ABSTRACT

In an effort to assist members of the American Association of Community and Junior Colleges (AACJC) in working to implement the Comprehensive Employment and Training Act (CETA), information is provided and issues are considered which are of concern to CETA prime sponsors and representatives of education. The issues include the goal of CETA to provide job training and employment opportunities for economically disadvantaged, unemployed, and underemployed persons, and the role of local, state, and federal agencies in implementing CETA legislation. The information contained in this document includes: (1) consideration of opportunities for education and excerpts and summaries of corresponding legislation from CETA of 1978; (2) an AACJC brief, summarizing CETA legislation; (3) a list of possible services under CETA (e.g., outreach, basic skill training, career counseling, and day care services); and (4) steps in the process of applying for CETA funds from a prime sponsor. Also included is a prime sponsor/education agreement checklist which covers assessment of existing resources, program description, program outcome and evaluation, and program administration. A final section discusses the contracting process and supplies a model contract. (MB)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ED165822

THE 1978 CETA ACT

HOW AACJC CAN PARTICIPATE

Office of Governmental Affairs
American Association of Community and Junior Colleges

One Dupont Circle N.W. Suite 410 Washington D.C. 20036 202-293-7050

U S DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

CONTENTS

I - Introduction
II - Excerpts from CETA of 1978
III - AACJC Brief on 1978 CETA Legislation
IV - Possible Services Under CETA
V - Steps in Applying for CETA Funds
VI - Prime Sponsor - Education Agreement Check-List
VII - Contracting Process and Model Contract
VIII - Allocation Under Title II and Title VI of CETA

"PERMISSION TO REPRODUCE THIS MATERIAL IN MICROFICHE ONLY HAS BEEN GRANTED BY
American Association of Community and Junior Colleges
TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC) AND USERS OF THE ERIC SYSTEM."

JC 790 080

January 10, 1979

American Association of Community and Junior Colleges

January 10, 1978

M E M O R A N D U M

TO: AACJC Member Institutions

FROM: John E. Tirrell, Vice President for Governmental Affairs

RE: Implementation of CETA by Prime Sponsors and AACJC Member Institutions

The purpose of the following information is to assist AACJC members in working to implement the 1978 Comprehensive Employment and Training Act (CETA). Issues addressed include those which are of concern to both CETA prime sponsors and representatives of education.

Opportunities are identified for postsecondary education in each CETA title. The source(s) of funding for each program needs to be established by representatives of the college and prime sponsor representatives working together. CETA places priority on economically disadvantaged youth and adults. Clients or students from a variety of income levels can be served in the same program when joint funding is arranged so that each funding agency can remain accountable for expenditure of its resources.

The CETA legislation is now "permanent" with funds authorized for the next four years.

Authorization levels
(Dollar amounts in billions)

	Fiscal years			
	1979	1980	1981	1982
Title II:				
Parts A, B, and C.....	$2	Such sums	Such sums	Such sums
Part D.....	3	(1)	(1)	(1)
Title III.....	(2)	(2)	(2)	(2)
Title IV.....	2.25	$2.4	Such sums	Such sums
Title V: House amendment.....	Such sums	Such sums	Such sums	Such sums
Title VI.....	(3)	(3)	(3)	(3)
Title VII.....	.5	.525	.....	.....
Title VIII.....	.35	.4	Such sums	Such sums
Labor Management Committee.....	.01	Such sums	Such sums	Such sums

1 - Such sums, but no more than 60 percent of the total appropriation for title II
2 - 20 percent of total minus title II-D and title VI.
3 - An amount sufficient to fund jobs for 20 percent of unemployed over 4 percent, except when unemployment reaches 7 percent, then sufficient funds for 25 percent of the unemployed in excess of 4 percent determined according to the procedures established in sec. 602.

One Dupont Circle / N.W. / Suite 410 / Washington / D.C. 20036 / 202-293-7050

It should be noted Title II, Part D is authorized for $3 billion in FY'79. Sec. 232(b)(2) specifies a minimum of this for training each of the next four years: 10% in '79, 15% in '80, 20% in '81 and 22% in '82. The Youth Programs in Title IV are authorized for $2.25 billion in FY '79. In addition Sec. 202 allocates special funds for vocational programs and other special educational purposes.

Please be aware that the definition of local education agency defined in Sec. 3(15)(A) includes any educational institution using federal vocational funds. The more restrictive definition of LEA - only covering K-12 - is used only in Title IV, Part A, subpart 3.

When a community college becomes involved in a CETA-education project it is recommended that all provisions of the applicable CETA legislation be reviewed along with CETA regulations. It is important to work closely with the prime sponsor in planning since each prime sponsor is responsible for establishing priorities and procedures for the area.

In the last section, we reproduce the proposed allocations of funds for each prime sponsor for Title II and VI and the additional funds proposed for Title IV (Youth Programs). By this you can see the funds available in your area.

For specific assistance you should contact your regional Department of Labor office and talk with the CETA staff there.

You should request a copy of P.L. 95-524, the amended CETA legislation, from the office of your Congressman or one of your Senators. The proposed regulations for CETA are to be presented in the Federal Register around January 19, 1979.

* *

The AACJC Office of Governmental Affairs has followed the reauthorization of CETA in the House, Senate and during Conference. We have participated in numerous meetings and studied the proposed regulations carefully. While we have had the assistance of many people, including the use of the excellent material developed by Toni Harris of the Illinois Community College Board, I must be responsible for any errors, oversights or omissions. Our efforts will be rewarded if this aids you in securing funds, additional job slots and/or training programs to assist more citizens in your area.

* *

JET:egd

I - Introduction

The Comprehensive Employment and Training Act (CETA) was designed to provide "job training and employment opportunities for economically disadvantaged, unemployed and underemployed persons," to enable them to secure and retain self-sustaining, unsubsidized employment. It is administered by the U.S. Department of Labor. CETA is the chief vehicle for manpower development and training programs, replacing the Area Redevelopment Act (ARA) of 1961, the Manpower Development and Training Act (MDTA) of 1962, the Economic Opportunity Act (EOA) of 1964, and the Emergency Employment Act (EEA) of 1971. Unlike the federally administered program efforts of the preceding 12 years, CETA offers a flexible decentralized system of comprehensive and decategorized training and employment subject to Federal agency oversight.

CETA Prime Sponsors are units of state and local government responsible for operating CETA employment and training programs to serve the needs of their communities. Prime sponsors are generally one of the following: states; cities or counties with populations of at least 100,000; or combinations of units of government called consortia, in which at least one member jurisdiction has a population of 100,000 or more. The Secretary of Labor may also designate additional sponsors if he/she determines that they have a special capacity for carrying out CETA programs within certain labor markets or rural areas with high unemployment. States may act as balance-of-state prime sponsors for smaller areas (usually rural) within their boundaries that are ineligible to become prime sponsors in their own right.

Prime sponsors are responsible for determining local needs and providing programs designed to meet them through such activities as classroom training, on-the-job training, work experience, public service employment, counseling, testing, job development, child care, and other supportive services. Sponsors can arrange

to provide these services directly or through contracts or sub-grants with such organizations as the state employment service, vocational education agencies, community colleges, community groups, or private firms. They are also responsible for monitoring and evaluating programs to insure that they meet local needs.

The Local Role

CETA requires each prime sponsor to establish a Planning Council with representation from all segments of the community, including (to the extent feasible) client groups and community-based organizations, the public employment service, education and training institutions, the business sector, labor, and where appropriate, agriculture.

The functions of the council are:

1. To submit recommendations to the prime sponsor regarding program plans, basic goals, policies and procedures.
2. To monitor and objectively evaluate employment and training programs in the prime sponsor's jurisdiction.
3. To provide for continuing analysis of employment and training needs.
4. To provide an easily accessible channel of communication between the prime sponsor and the community.
5. To improve the utilization and coordination of the delivery services under CETA and other social services programs in the prime sponsor area.

The State Role

The state role under CETA is multifaceted, encompassing the function of program operator, coordinator and evaluator. Functions are summarized as follows:

1. To provide services to the balance-of-state areas that do not fall within the jurisdictions of independent prime sponsors.

2. There are special allocation of funds for special provisions.

Special Provision	Funds Allocated
a-Sec. 204 - Supplemental Voc. Ed. Assistance (6%)	-Sec. 202 (b)
b-Sec. 110 - State Employment and Training Council (1%)	-Sec. 202 (c)
c-Encouraging coordination and linkages (1%)	-Sec. 202 (d)
d-Sec. 105 - Gov. coordination and special service plan (4%)	-Sec. 202 (e)

3. To appoint a State Employment and Training Council representative of the various segments in the State.

4. To provide staff support to the council.

5. To establish a planning process which insures equitable services for all jurisdictions in the prime sponsor area.

6. To establish an appeal procedure.

7. To promote cooperation between the business community, labor, client groups and community organizations in order to meet the employment and training needs of the prime sponsor area.

The Federal Role

The role of the Federal Government can be characterized as one of "oversight". The legislative intent of CETA was one of decentralization, of shifting responsibility from the Federal Government to the local level. While there is a strong and active Federal role at all stages of planning, review, and implementation, the day-to-day operations and decision making are retained at the State and local levels.

The four most significant elements of the Federal role are summarized as follows:

1. To establish national objectives, priorities and performance standards.
2. To provide technical assistance.
3. To review and approve plans.
4. To assess and evaluate performance.

II-EXCERPTS, SUMMARIES AND OPPORTUNITIES FOR EDUCATION FROM CETA OF 1978

The purpose of the Comprehensive Employment and Training Act of 1978 (CETA) is identified as:

> Sec. 2. "It is the purpose of this Act to provide job training and employment opportunities for economically disadvantaged, unemployed, or underemployed persons which will result in an increase in their earned income, and to assure that training and other services lead to maximum employment opportunities and enhance self-sufficiency by establishing a flexible, coordinated, and decentralized system of Federal, State, and local programs. It is further the purpose of this Act to provide for the maximum feasible coordination of plans, programs, and activities under this Act with economic development, community development, and related activities, such as vocational education, vocational rehabilitation, public assistance, self-employment training, and social service programs."

Definitions in CETA which relate to education include:

> ACADEMIC CREDIT - Sec. 3. "As used in this Act "(1) The term 'academic credit' means credit for education, training, or work toward a secondary school diploma, a post-secondary degree, or an accredited certificate or completion, consistent with applicable State law, regulation, and policy and the requirements of an accredited educational agency or institution in a State."
>
> INSTITUTIONS OF HIGHER EDUCATION and POST-SECONDARY INSTITUTIONS - Sec. 3 (14) "The term 'institutions of higher education' and 'postsecondary institutions' mean those institutions defined as institutions of higher education in section 1201(a) of the Higher Education Act of 1965."
>
> LOCAL EDUCATION AGENCIES - "(15) (A) Except as provided in subparagraph (B), the term 'local educational agencies' means agencies defined in section 195 (10) of the Vocational Education Act of 1963. (This then includes any community or Junior College, or Technical Institute that has a program funded with vocational education money.)
>
> "(B) For purposes of subpart 3 of part A of title IV, such terms means agencies as defined in section 1001 (f) of the Elementary and Secondary Education Act of 1965, as amended by the Education Amendments of 1978."

PROJECT APPLICANTS - Sec. 3(20) "The term 'project applicants' includes States and agencies thereof, units of general local government and agencies thereof or combinations of associations of such governmental units when the primary purpose of such combinations or associations is to assist such governmental units to provide public services, special purpose political subdivisions having the power to levy taxes and spend funds or serving such special purpose within an area served by one or more units of general local government, local educational agencies, institutions of higher education, community-based organizations, community development corporations, nonprofit groups and organizations serving Native Americans, and other private nonprofit organizations or institutions engaged in public service."

PUBLIC SERVICE - Sec. 3(22) The term 'public service' includes work, including part-time work, in such fields as... education, child care... and other fields of human betterment and community improvement.

We find in Sec. 103. (a) (3): Comprehensive employment and training plan.

"(A) the methods and institutional arrangements which will be used to involve community based organizations, educational agencies, and other deliverers of services in the development and implementation of the programs assisted under this Act; and

"(B) the methods and criteria which will be used to select such deliverers of services from an inventory of potentially available deliverers of services (which have expressed an interest in writing) maintained by the prime sponsor as records accessible to the public;"

There is important language in Sec. 203(c) (1).

"(C)(1) The Secretary shall not provide financial assistance under this title for any fiscal year to a prime sponsor unless the prime sponsor provides assurances that (consistent with needs identified in the prime sponsor's plan submitted under section 103(a)) it shall make agreements with State or local educational agencies or postsecondary educational institutions for the conduct of employment and training programs, which programs may consist of-

"(A) vocational training designed to prepare individuals for employment;
"(B) instruction in basis cognitive skills necessary to obtain employment or pursue further education or training designed to prepare individuals for employment;
"(C) employment of persons in schools controlled by such agencies or in postsecondary institutions; and
"(D) such other employment and training activities as may be consistent with the purposes and provisions of this title."

III

AACJC BRIEF ON 1978 CETA LEGISLATION
(CC Used to Identify All Types of AACJC Members)

SECTION 103(a) -	Requirements for the Prime Sponsor's "Master Plan" which serves as the long range Charter for operation.
Sec. 103(a)(3)(A) -	CC can be identified in prime sponsor's training plan, along with methods that will be used to involve CC in delivering services.
Sec. 103(a)(6) -	The "master plan" must state the appropriate arrangements with educational agencies (including CC) for participation in the planning of programs.
Sec. 103(a)(13) -	CC can work with prime sponsors to set-up methods and arrangements for the utilization of CC's in providing instruction in basic cognitive skills and other programs.
Sec. 103(a)(14) -	Representatives of CC may be involved in development of prime sponsor's Comprehensive Employment and Training Plan.
Sec. 103(b)(4) -	CC can be involved in identifying performance and placement goals which are appropriate for youth and adults in CETA education, job-training or related instruction program.
SECTION 104 -	Relates to review of both Master and Annual Plan of the prime sponsor's CETA training plan.
Sec. 104(a)(2)(C) -	CC representatives may review and comment on the training plans for 30 days.
Sec. 105(b)(1) -	Governor's coordination and special services activities shall include all appropriate educational institutions, including postsecondary and higher education.
Sec. 105(b)(12) -	CC eligible to receive information from the State Occupational Information Coordination Committee through the Governor's Coordination and Special Services activities.
Sec. 106(b) -	Certain necessary administrative costs can be paid to CC for CETA program.
Sec. 110(b) -	The State Employment and Training Council shall meet at least five times each year review and evaluate the operation of each prime sponsor, including the training plans with regard to nonutilization or duplication of existing services.
Sec. 111(a) -	DOL and HEW must work together and solicit advice and counsel from state and local education agencies.
Sec. 121(b)(1)(B) -	CETA programs by CC should be designed to lead to employment and to advanced technical or management training for those who desire this option.
Sec. 122(M) -	CC are eligible for public service employment slots.
Sec. 127(b) -	Information may be required on college-CETA cooperative efforts.

TITLE II - Comprehensive Employment and Training Services

Sec. 201 -	CC and CETA can cosponsor programs which lead to employment of persons who are 16 years and over.
Sec. 202(b) -	CC are eligible to apply for funds provided for supplemental vocational education assistance.
Sec. 202(d) -	One percent of the Governor's money must be used for services relating to coordination and linkage between prime sponsors and CC's.
Sec. 203 -	CC are eligible CETA programs of vocational education, basic cognitive skills, jobs for students who need income to stay in school and related services.
Sec. 203(c)(3) -	An appeal system exists - if needed - by a CC.
Sec. 204(a)(1) -	See Sec. 202(b). Services can include linkages in CC and support of CC students.
Sec. 211 -	CC in CETA programs can provide job orientation and counseling, vocational education, related basic skills and OJT experiences.
Sec. 213 -	CC can operate CETA sponsored or CETA and CC can jointly sponsor programs when funds are "blended" in such a way that CETA and the college can be accountable for expenditures.

Sec.232(b)(2)

"Not less than -

"(A) 10 percent of the funds so allocated for fiscal year 1979;

"(B) 15 percent of the funds so allocated for fiscal year 1980;

"(C) 20 percent of the funds so allocated for fiscal year 1981;

"(D) 22 percent of the funds so allocated for fiscal year 1982;

shall be used only for training."

TITLE III - Special Federal Responsibilities

Sec. 301(a) -	Title III services are similar to other parts of 1978 CETA - but with greater federal direction.
Sec. 301(a)(3) -	CC are encouraged to work with local employment and training agencies and the private sector.
Sec. 301(a)(4) -	Programs of demonstrated effectiveness can continue.
Sec. 301(a)(5) -	Programs may be funded to reduce critical skill shortages in the labor force.
Sec. 301(b)(1)(A) -	CC can provide job training, home management and support services for displaced homemakers.
Sec. 301(b)(2) -	Programs can be provided for offenders.
Sec. 301(b)(3) -	Programs can be provided for people of limited English speaking ability.
Sec. 301(b)(4) -	Programs possible for the handicapped.
Sec. 301(d) -	CC can provide programs to prepare students for self-employment.
Sec. 301(g)	CC can provide programs to prepare for small business, with a wide range of educational experiences mentioned.
Sec. 302(a) -	Programs possible for American Indians, utilizing Indian lands, etc, when possible.

Sec. 303(a) -	Programs authorized for migrants.
Sec. 308(a) -	Programs authorized for workers, age 55 and older, including the receipt of training allowances.
Sec. 311(a) -	Innovative programs or research may be conducted to eliminate sex-role or racial stereotyping, or to ease the move from school to work.
Sec. 311(b) -	CC's can apply for funds for experimental CETA projects.
Sec. 311(f) -	CC's can be involved in operation of community vocational resource centers.
Sec. 314 -	CC can be involved in training personnel to operate CETA programs.
Sec. 315(a) -	CC can be involved with career information provided by NOICC - National Occupation Information Coordinating Committee.

TITLE IV - Youth Programs
(FY '79 Authorization $2.25 Billion, FY '80 $2.4 Billion)

Sec. 401 -	CC can provide training and employment programs in ways which provide exploration and alternative methods for improving skills.

Part A - Youth Employment Demonstration Programs (YEDP)

Sec. 416(a)-	CC can apply through Prime Sponsor to DOL for funds for students who have not completed high school but want skill and GED.
Sec. 417 -	CC can design programs which include a job and education. The job may be part of the educational program or a source of income to garner the skill and earn a GED.
Sec. 418(a) -	CC need to work with Prime Sponsors in planning a proposal for YIEPP - Youth Incentive Entitlement Pilot Projects.
Sec. 418(b) -	YIEPP programs may be for non-high school grads between 19 and 25 years.
Sec. 418(k) -	YIEPP in CC provide a job only as long as the student stays in school.
Sec. 419(b) -	Student jobs in YIEPP in CC cannot replace jobs funded by local money.
Sec. 421 -	Youth Community Conservation and Improvement Projects - CC eligible for YCCIP or can co-sponsor.

TITLE IV - Part A - Subpart 3 (YEPT) Youth Employment and Training Programs - The only subpart of the entire CETA legislation that LEA means K-12.

Sec. 431 -	CC's can work with K-12 districts on the 22% setaside but are directly eligible for the other 78%!!
Sec. 432(a) -	Jobs can be provided for economically disadvantaged students, also support services, counseling, placement, internships, work-experience, remedial reading and math, work toward GED, field trips, provide child care.

Sec. 433(c) -	The Governor shall use 5% of the YEPT funds for exemplary projects.
Sec. 436(a) -	The Prime Sponsor's application to DOL for YETP funds must indicate the role and scope of educational agencies.
Sec. 438(a)(1) -	CC should watch for "Requests for Proposals" from DOL.

Subpart 4 - General Provisions

Sec. 441 -	DOL to distribute 15% to Subpart 1, 15% to 2 and 70% to Subpart 3.
Sec. 444(a) -	YCCIP and YETP are for youths with "severe handicaps" in becoming employed.
Sec. 445 -	Graduation from YED programs and toward a GED, when appropriate, is important.
Sec. 445(c) -	Programs under Title III - YEDP - need to lead to either a permanent job or to another postsecondary or adult program.

TITLE IV-B - Job Corps

Sec. 450 -	CC are eligible to apply for job corps funds to serve eligible youths.
Sec. 452 -	The age requirements are 16 to 22 years of age.
Sec. 460 -	CC can be evolved in consultation and cooperation with job corps.

TITLE IV-C - Summer Youth Program

Sec. 481 -	Eligible CC students can be involved in CETA sponsored summer employment and related education.

TITLE V - National Commission for Employment Policy

TITLE VI - Countercyclical Public Service Employment Program

Sec. 601 -	Since this program will be activated when national unemployment rate is in excess of 4%, it probably will be in operation for some time.
Sec. 603(a) -	CC can employ unemployed staff and provide them with in-service training and counseling.
Sec. 603(b) -	Some funds will be used for unemployed teachers.

TITLE VII - Private Sector Opportunities

Sec. 701 -	CC can offer programs with the private sector to reach additional hard-to-place students.
Sec. 703(a) -	Prime sponsor's plan for private sector to include relationships with education.
Sec. 704(a)(1) -	Educators serve on Private Industry Council
Sec. 705(a)(3) -	Prime sponsor's plan can include internships, work-study, innovative programs and services between education and the private sector.

TITLE VIII- Young Adult Conservation Corps

Sec. 801 -	CC near public lands can get involved with YACC.
Sec. 802 -	CC can provide education and training for YACC project participants.
Sec. 804(c) -	USOE and DOL need to arrange credit toward graduation from a postsecondary institution when appropriate.

* * * * *

IV - POSSIBLE SERVICES UNDER CETA

Services	Provided by Whom	Number Served	Amount of YEDPA Funds Allocated
a. outreach			
b. orientation			
c. career development or employability planning			
d. labor market information			
e. occupational information			
f. basic-education			
g. tutoring & other educational support			
h. GED preparation			
i. bilingual support			
j. literacy training			
k. vocational exploration			
l. basic skill training			
m. work experience			
n. job training other than work experience			
o. apprenticeship			
p. counseling			
q. career counseling			
r. transportation assistance			
s. day care services			
t. job restructuring			
u. job development			
v. placement			
w. others!			

V - STEPS IN THE PROCESS OF APPLYING FOR CETA FUNDS FROM A PRIME SPONSOR

There are nine major steps that should be followed when applying for CETA funds from a prime sponsor. They are:

1. Find out who your prime sponsor is;
2. Find out who the prime sponsor's CETA planner is;
3. Make an appointment to talk with the planner;
4. Talk with the planner;
5. Become familiar with CETA in your area;
6. Find out the CETA funding process for your area;
7. Determine the method for submitting your funding application;
8. Complete and submit your application; and
9. Be visible and active on a year-round basis.

Step 1 - FIND OUT WHO YOUR PRIME SPONSOR IS.

In order to apply for CETA funds, the first step is to determine the agency and location for the CETA prime sponsor in your area. There are three possibilities. Your area will be covered by either a local, city or county prime sponsor, by a consortium prime sponsor, or by a balance of State prime sponsors. If you do not know, ask the Governor's office for your prime sponsor's name, address and telephone number.

Step 2 - Once you have this information, call the prime sponsor and FIND OUT WHO THE PRIME SPONSOR'S CETA PLANNER IS.

The CETA planner (or manpower planner) is the key person with whom you will need to deal. Every prime sponsor has identified one or more persons as the planner. This person is generally the major source of CETA information for the prime sponsor. In many instances, the planner will have additional responsibilities other than the planner. Also, many planners are administrators and/or decision makers for the CETA program as well. Thus, it is extremely important to get to know and keep in general contact with this person.

Step 3 - You should then MAKE AN APPOINTMENT TO TALK WITH THE PLANNER as soon as possible.

If your prime sponsor is a local one, you will very probably talk directly with the planner. If your prime sponsor is a consortium or balance of State, you may be instructed by the planner to talk with a designated person in your local jurisdiction rather than directly with the planner. This depends entirely on your prime sponsor's administrative structure, and the planner will know the proper method for access to the prime sponsor.

You should then state that the purposes of the requested meeting are: (a) to introduce your agency to the planner (if this has not been previously done), (b) to determine the prime sponsor's funding cycle, (c) to inquire about the present CETA programs being funded, and (d) to discuss future funding possibilities.

Step 4 - The next step is to TALK WITH THE PLANNER about the four areas mentioned in Step 3.

In introducing your college to the planner, you should describe its purpose, size and functions and activities. Prime sponsors are required by the CETA legislation to serve those members of the community who are unemployed, underemployed, and/or economically disadvantaged. In order to accomplish this, prime sponsors should work with local agencies and groups representing those target groups. Therefore, you should present your college in those terms to the planner: how you intend to or already are serving those target groups.

The first consideration in determining your next action is the prime sponsor's timetable for making the Fiscal Year funding decisions. This will generally be based on two factors: (a) the prime sponsor's fiscal year or program year dates[1], and (b) the date that funding applications are due in to the prime sponsor.

The next consideration is the present funding amount for CETA in your community. The planner can make a list of services and program operators available to you. This information can help you to draw up a realistic proposal and avoid wasted effort. For example, your college may have considered requesting funds to set up a comprehensive counseling center. You may find out that such a center already exists. In this case, you may decide that your proposal should concentrate on providing additionally needed services to the existing center.

When you have a specific funding request in mind, this would be an excellent time to discuss it with the planner. You should decide your funding request both in the general terms of what you want funded and why; in the specific terms, if you have them, of dollars required; the exact types of service to be provided; the significant segments (target groups) you will serve and; other pertinent information. You should also discuss a realistic dollar figure for your proposal with the planner.

Probably the most important part of this discussion is why you want to receive CETA funds. It is critical to establish the need to obtain funding since the prime sponsor must justify the funding requests made to the Department of Labor in terms of meeting the communities' employment and training needs. Therefore, if you can demonstrate to the prime sponsor the extent to which you will be serving the unemployed, underemployed, and/or disadvantaged through your funding proposal, you will be that much ahead in the process. One of the most effective ways to accomplish this is through the use of statistics. If you have difficulty gathering

---

[1]It is important to determine the prime sponsor's fiscal year and funding cycle dates. The Federal Government's fiscal year will start October 1 and end September 30.

this information, the planner should be able to provide you with assistance. Generally, you should find detailed demographic data, income data, education levels, labor force information, and skill shortage for any additional information required. It will be extremely useful if you become familiar with data sources and the most effective methods of utilizing them.

Step 5 - After you have had this preliminary introduction to CETA and to the CETA planner, you should BECOME FAMILIAR WITH CETA IN YOUR AREA.

Since CETA is becoming more integrated into the local governmental structure, it generally facilitates your ability to work with CETA if you know how to work with the political system of which CETA is a part. This includes:

a. Determing the role of the prime sponsor's Planning Council[2] in the CETA decision making process and possible inputs at that level. You should determine whether or not the Council considers funding requests. If it does, you should then determine the methods for making your requests known. The planner can help with this and can also furnish the name of the chairperson of the Council.

b. Determining CETA's role in the general budget cycle for your prime sponsor's governing body (for example, city council or county board) and possible inputs you can have in that process. This may mean appearing at public hearings and by other means of directly making your views and needs known to the decision makers.

c. Acquainting yourself with the overall role of the governing body for your jurisdiction and possible inputs at this level. For example, if the governing body publishes agenda in advance of public meetings, you should ask to be put on a mailing list if there is one, or find where you may obtain agenda copies. You should also find out how CETA is listed on such agenda--whether by name, or as "manpower activities", "community services", etc. This sometimes varies even within the jurisdiction itself, depending on the particular aspect of CETA being discussed.

Step 6 - In order to have specific input, you should FIND OUT THE CETA FUNDING PROCESS FOR YOUR AREA.

Once again the planner would be your key contact for this information. There are many variations of funding methods used by prime sponsors. Some fund programs only once a year, others fund incrementally throughout the year. Some have a contingency fund in the event new proposals are brought to their attention.

In addition to these variations, prime sponsors have many ways of requesting funding proposals from their communities. Some prime sponsors issue requests for proposals (RFP) and follow a formal RFP procedure. In this case, they usually

---

[2]Each prime sponsor is required to establish a Planning Council made up of community representatives to advise and make recommendations to the prime sponsor concerning CETA activities.

issue either specific RFP's in which they are seeking a program operator(s) for a predetermined program or service to be provided, or they may issue a general RFP which solicits proposals that have a broader scope. Some prime sponsors may utilize a public hearing process at which all agencies that request funding state their proposals. Other prime sponsors may accomplish this by a presentation to the governing body. If you ask to have your agency put on the solicitation list, or other appropriate means to receive funding requests the prime sponsor utilizes, as well as determine exactly how and when the funding system works, you can probably have a more effective input on this process.

Step 7 - After you find out the methods and schedules for funding, you should DETERMINE THE METHOD FOR SUBMITTING YOUR FUNDING APPLICATION.

This, of course, depends on the information previously obtained. The most important consideration is to follow the prime sponsor's guidance in this area. However, you should be aware of your other options as well. Generally, there will be four ways to submit proposals: answer an RFP, prepare a presentation to be made at a public hearing, submit an unsolicited proposal[3], and make a direct presentation to the governing body for your jurisdiction.

Step 8 - After you know which method you will use, you should then COMPLETE AND SUBMIT YOUR APPLICATION.

The two most important considerations here are timeliness and thoroughness. Your request should build from the justification for funding based on fulfilling a community need to serve unemployed, underemployed, and/or disadvantaged significant segments and continue from there. Also, the prime sponsor will very probably provide you with instructions on completing funding applications. If this is not provided go back to the planner and ask.

Step 9 - The final step, Step 9, is BE VISIBLE AND ACTIVE ON A YEAR-ROUND BASIS.

If you are funded, congratulations! If you are not funded, do not give up. Offer any volunteer services to the prime sponsor that your agency can provide, such as emergency day care for CETA participants. Keep yourself visible and active throughout the year, rather than just at funding time. Contact the agencies that did receive funding to see if there are services you can offer them. Up-date your application and find ways to improve it for the next try. Most importantly, keep in contact with the prime sponsor to see how the employment and training needs of the community are being served throughout the year.

---

[3] If you miss the cut-off date for submitting applications, if the prime sponsor does not request proposals, or; in any other circumstance in which you want to draw your funding request to the prime sponsor's attention, you may submit an unsolicited proposal to the prime sponsor at any time.

VI - PRIME SPONSOR/EDUCATION AGREEMENT CHECK-LIST

A. Assessment of Existing Resources

1. Does the agreement include an assessment of existing community resources, including the identification of programs that deliver services to youth?

2. Was the information gathered in the assessment of community resources used in developing the program?

3. Are linkages, such as sharing of program services, to be developed with community organizations identified in the assessment?

4. Have the occupations with employment potential been identified?

5. Will the program prepare youth and/or adults to enter into the occupations with employment potential that have been identified?

6. Was a demographical study of the youth and/or adult population within the geographical area that the program will serve undertaken?

7. Is the program being targeted to serve youth and/or adults who have been identified as having the greatest need?

8. Was the information that was gathered in the demographical study used in developing the program?

B. Program Description

1. Does the agreement clearly state what the purpose, goals and objectives of the program are?

2. Does the agreement indicate how may persons are expected to be served?

3. Are efforts being made to coordinate and link the program with the educational system (e.g., will participants receive academic credit for competencies gained while enrolled in the program?)

4. Has the agreement described how persons will be recruited for enrollment in the program and who is responsible for determining eligibility?

5. Are individual's training and career needs to be assessed in order to determine which program services they should receive?

6. Are program participants to receive labor market and career information to aid them in deciding what their needs and their occupational interests are?

7. Does the program provide counseling guidance and placement services as required?

8. Does the agreement identify which organizations are responsible for placement of those who have terminated from the program?

9. If there is a work experience component, has an effort been made to locate work experience slots in occupational areas for which there is an employment potential?

10. Does the work experience component provide a learning experience to the participant?

11. In selecting supportive services to be offered by the program, were the individuals needs taken into consideration?

12. Does the agreement provide for certification that jobs provided are relevant to the career goals of the participants?

13. Does the agreement state which organizations are responsible for providing specified services?

C. Program Outcome and Evaluation

1. Does the agreement state what the expected outcomes of the program are?

2. Are the expected outcomes consistent with the goals stated in the agreement?

D. Program Administration

1. Does the agreement indicate the number and duties of personnel that will be required to operate the program?

2. Can existing staff be used to operate all or a part of the program?

3. Does the agreement indicate that a minimum supervisor/enrollee ratio of 1 to 12 will be maintained?

4. Does the agreement indicate who will be responsible for reviewing the progress of the program, what will be reviewed, and how often the program will be reviewed?

5. Are there provisions for modifying the program subject to review results?

6. Does the agreement list the reporting requirement, and to whom these reports will be submitted?

7. Does the agreement state which organization is responsible for the financial aspects of the program?

8. If it is a financial agreement, is there a budget attached and are funds broken out by line items (e.g., staff salaries and benefits, work-experience, support services)?

9. Are there provisions for evaluating the program?

VII - Contracting Process and Model Contract

Prime Sponsors as well as community colleges usually have adopted a standard procedure for entering into an agreement with another agency. With the understanding that each agency may differ in the type of agreement, the kind of items to be included and the degree of specificity needed, this information has been gathered to assist those parties seeking ways to enter into a more formal contractural agreement.

A contract is a two way agreement between two parties. It is important for both the prime sponsor and the sub-contractor to understand the terms of the contract. Although the contract is usually written by the prime sponsor it is equally important for the sub-contractor to review the format and contents of the contract to be sure all the necessary points are covered in order to protect their interests.

The following information is divided into four sections: Basic sub-agreement contents, implementation and administration of sub-grants and contracts, close-out of sub-agreements, and a sample or model contract.

Special note: Prime Sponsors are provided with the following legal references and technical assistance guides. If the prime sponsor refers to the publications as part of the terms of the contract, the publications should be furnished to the sub-contractor.

- Comprehensive Employment and Training Act of 1978, Public Law 95-524;
- CETA Regulations, scheduled for publication about January 19, 1979 in the Federal Register probably Parts 675 through 688;
- Federal Management Circular (FMC) 74-4 (formerly OMB Circular A-87);
- FMC 74-7 (formerly OMB Circular A-102);
- OMB Circular A-110 (available August, 1976);
- OMB Circluar A-95;
- Equal Employment Opportunity requirements as defined in Executive Order 11246;
- Civil Rights Act of 1964, as amended;
- Hatch Act;
- Federal Fair Labor Standards Act;
- MA Property Handbook No. 303 and/or MA Property Handbook for Contractors;
- CETA Audit Guide;
- Program Assessment Guide;
- Manpower Program Planning Guide; and
- Management Information Systems Guide.

Model Contract

A. Sample Cost-Reimbursement Sub-Agreement

The following is a sample cost-reimbursement sub-agreement which could be used either as a sub-grant or a contract. The format could also be used for fixed-price sub-agreement. It contains:

A. Two samples of signature sheets,
B. A completed narrative (work statement),
C. Budget and budget back-up forms,
D. Participant services schedule forms, and,
E. Sample assurances and provisions.

This format contains everything a sub-agreement will probably need. It can be added to or subtracted from as the prime sponsor requires.

See charts on following pages.

B. Sample Narrative (Work Statement)

Explanation: This sample narrative or work statement describes a vocational skills training program operated by a skills center. It shows one method of completing a narrative.

Skills Training Narrative

A. Program Goals

The Well-Known County Skills Training Center (hereinafter called the contractor), under a cost-plus-award fee contract from the Well-known County CETA Prime Sponsor, will provide skills training for the unemployed, underemployed, and economically disadvantaged residents of Well-Known County who are selected by the prime sponsor to participate in the skills training program. Training will be provided to bring participants to industrial, commercial, and professional standards in the occupations listed in Section C of this narrative for at least entry level job performance in permanent, meaningful employment.

B. Types of Services and Activities

Skills training will be implemented as follows:

- CETA participants will be recruited and selected by the prime sponsor. Applicants who inquire at the skills center will be referred to the prime sponsor for determination of eligibility and appropriate referral.
- The secretarial course and licensed practical nursing course will have training entrance criteria. Application of entrance criteria will be performed by joint decision of the prime sponsor and the contractor.
- Courses will operate by continuous slotting (open entry/open exit) except for the licensed practical nursing course, during the period of October 1, 1976 to September 30, 1977.
- Contractor staff will provide special, individualized instruction when necessary.

A. Sample Contract/Sub-grant Signature Sheet #1 Contract/Subgrant No.

Grantor (Prime Sponsor)	Contractor/Sub-grantee	Modification No.

This contract/sub-grant is entered into by the Prime Sponsor, hereinafter referred to as the Grantor and _____ hereinafter referred to as the Contractor/Sub-grantee. The Contractor/Sub-grantee agrees to operate a program(s) of the Grantor's Comprehensive Employment and Training Act (CETA) Program in accordance with the provisions of this agreement. This Contract/Sub-grant consists of this sheet, the budget, the budget back-up, reporting forms, a narrative description of the program, a participant services schedule, and the assurances and certifications.

A. Type of Agreement

☐ Cost Reimbursement ☐ Cost Plus Fixed Fee ☐ Fixed Price

☐ Cost Plus Award Fee ☐ Cost Plus Incentive Fee ☐ Fixed Unit Price Plus Incentive Fee

B. Obligation

Total cost to the Prime Sponsor's CETA grant will not exceed $_____.

This cost will cover the period _____ to _____

C. Modification

(1) This modification ☐ increases ☐ decreases ☐ does not change the funds previously obligated by $_____ to a total obligation of $_____.

(2) Description of Modification

_____

_____

Approved for the Grantor		Approved for the Contractor/Sub-grantee	
By (Signature)		By (Signature)	
Name and Title	Date	Name and Title	Date

A. Sample Signature Sheet #2

AGREEMENT NUMBER ___

WHEREAS, the State/County/City of _____ as the Prime Sponsor, has entered into an AGREEMENT with the United States Department of Labor, Employment and Training Administration, to implement a Comprehensive Employment and Training Program in the _____ pursuant to the provisions of the Comprehensive Employment and Training Act of 1973, as amended, and,

WHEREAS, the Prime Sponsor desires that

NAME: _____

ADDRESS: _____

_____, be the

Operating Agency to implement _____ for _____ participants.

NOW THEREFORE, the Operating Agency hereby agrees to perform the functions set forth under the terms and conditions established in this _____ type of sub-grant/contract/agreement (state cost-reimbursement, fixed price, cost plus incentive fee, fixed price plus incentive, cost plus award fee, cost plus fixed fee or other type in the above blank space). This sub-grant/contract/agreement consists of the following:

I. Program Narrative
II. Participant Service Schedule
III. Budget
IV. Assurances and Certification

The functions of the Operating Agency are to commence on _____ and shall be undertaken and completed in such sequence as to assure their effectual accomplishment in light of the purpose of this sub-grant/contract/agreement, but in any event, all of the actions required hereunder and any obligations to and of the Prime Sponsor, shall commence _____ and shall be completed by _____.

IN CONSIDERATION of the foregoing, the Prime Sponsor does agree to pay the Operating Agency allowable costs incurred in the performance of this sub-grant/contract/agreement, in an amount up to but not to exceed $_____ to be paid from Federal funds received.

SIGNATURES

Prime Sponsor Name and Address

_____

_____

_____

BY: _____
(Signature)

NAME and TITLE: _____

_____

_____

DATE: _____

ATTEST: _____

Approved for the Operating Agency

Signature: _____

Name: _____

Title: _____

_____

DATE: _____

ATTEST: _____

- Skill training will provide for the completion of the training program in the shortest possible time.
- The contractor will be responsible for individual participant counseling.
- Contractor staff will inform the prime sponsor of each participant approaching completion of training at least four weeks prior to completion of the course.
- In the case of unsatisfactory performance of a CETA participant, a joint conference of prime sponsor and contractor staff will take place before termination.
- The contractor will be responsible for employability development of the participants through techniques such as group counseling, practice job interviews, etc.
- Detailed curricula for each course are provided by the contractor in Attachment A (not included for this sample).
- Books provided to participants for use during the skills training course which can be useful to them after the course (such as Business English for secretarial students) will remain with the participants after successful completion of the course.
- Students who become job-ready will be cooperatively placed by contractor and prime sponsor job placement staff. Final responsibility for job placement rests with the prime sponsor.
- Hours of instruction will be 7 hours per day, 5 days per week, from 8:30 a.m. to 4:00 p.m. with one-half hour for lunch.
- The training center will be closed on weekends and the following days (relevent holidays):

C. Program Objectives

The following courses will be provided by the contractor:

	Continuous # of Slots	Start Date	End Date	Class Length
Beautician/Cosmetologist[1]	20	10-1-76	9-30-77	1 yr.
Dental Assistant[2]	16	10-1-76	2-29-77	5 mos.
		3-1-77	6-30-77	5 mos.
Secretary[3]	18	10-1-76	3-31-77	6 mos.
	18	4-4-77	9-30-77	6 mos.
Licensed Practical Nursing[4]	35	10-1-76	9-30-77	1 yr.

* * * * * * * * * * * * * * *

Program Year to Date Plan

	12-31-76		3-31-77		6-30-77		9-30-77	
	Tot. Serv.	Curr. Enroll.	Tot. Serv.	Curr. Enroll.	Tot. Serv.	Curr. Enroll.	Tot. Serv.	Curr. Enroll.
Beautician/Cosmetologist[1]	20	20	21	20	24	20	24	0
Dental Assistant[2]	16	16	36	16	40	16	40	0
Secretary[3]	20	18	22	18	42	18	44	0
Licensed Practical Nursing[4]	37	35	37	35	37	35	37	0

Performance Standards for Each Course (Measurable Objectives)

1. It is projected that 80 percent of entering participants taking the Beautician/ Cosmetologist Course will successfully complete the course and pass the State Licensing Test.
2. It is projected that 75 percent of entering participants taking the Dental Assistant Course will successfully complete the course and pass the State Licensing Exam.
3. It is projected that 80 percent of entering participants taking the Secretarial Course will successfully complete the course, typing at least 80 words per minute.
4. It is projected that 90 percent of entering participants taking the Licensed Practical Nursing Course will successfully finish the course; 85 percent will pass the State Licensing Exam.

D. Staffing

Job descriptions and resumes of staff will be on file with the contractor and available for review by the prime sponsor. The prime sponsor shall have the authority to require satisfactory performance of contractor staff assigned to CETA participants. Contractor staff shall attend prime sponsor staff training as required.

E. Reimbursement

(Alternatives based on type of reimbursement chosen)

1. Vouchers will be submitted on a monthly basis to the prime sponsor for billing of expenses actually incurred using forms provided by the prime sponsor.
2. Vouchers will be submitted monthly to the prime sponsor on a fixed cost per training hour basis. The cost per hour will be $_____ for Beautician/Cosmetologist, $_____ for Dental Assistant, $_____ for Secretarial, and $_____ for Licensed Practical Nursing.
3. Vouchers will be submitted monthly to the prime sponsor for payment on a combination fixed cost/number of completion basis. The costs per hour of training will be $_____ for Beautician/Cosmetology, $_____ for Dental Assistant, $_____ for Secretarial and $_____ for Licensed Practical Nursing, (the rate could be half the rate in #2 above). The rate per successful completion will be $_____ for Beautician/ Cosmetologist, $_____ for Dental Assistant, $_____for Secretarial, and $_____ for Licensed Practical Nursing.

F. Property

A list of property to be purchased, leased, or rented for this program, including costs, is part of the attached approved budget. (Not included in this sample).

G. Reports Required

1. The contractor will provide to the prime sponsor on a monthly basis within five working days after the end of the month a summary of student enrollment, financial reports, participant program reports and other reports at such time and in such form as may be required by the prime sponsor. Copies of the activity and financial report are attached. (Not included in this sample).

CHARGEABLE COST CATEGORIES BY FUNCTIONAL AREA

Functional Area:	Cost Categories:					
	Administration	Training	Services	Participant Wages	Participant Fringes	Participant Allowances
Classroom Training	X	X	X		X	X
On-The-Job Training	X	X	X			
Public Service Employment	X	X	X	X	X	
Work Experience	X	X	X	X	X	
Services to Participants	X		X	X	X	X*
Other Activities	X	X	X	X	X	X*

*Participants may be paid either allowances or wages for time spent in services and other activities, depending on the circumstances of their involvement in those activities.

APPLICABLE LINE ITEMS BY COST CATEGORIES

Line Items:	Cost Categories:					
	Administration	Training	Services	Participant Wages	Participant Fringes	Participant Allowances
Participant Salaries & Wages	X	X	X	X		
Participant Fringe Benefits	X	X	X		X	
Expendable Supplies	X	X	X		X	
Communications	X	X	X			
Sub-Contract Services	X	X	X			
Staff Travel	X	X	X			
Equipment Rental & Service	X	X	X			
Equipment Purchases	X	X	X		X	
Staff Training	X					
Building Rental & Utilization	X	X	X			
Allowances						X
Supportive Services			X	X	X	X*
Manpower Services			X	X	X	X*
Transportation (Participants)			X			
Other Activities	X	X	X	X	X	X*

*Participants may be paid either allowances or wages for time spent in services and other activities, depending on the circumstances of their involvement in those activities.

2. The contractor will maintain time and attendance records on participants and staff.

H. Equal Employment Opportunity

The contractor will submit to the prime sponsor a written affirmative action compliance program within 60 calendar days of the signature of this contract.

I. Grievance Procedure

CETA participants may appeal any decision or action taken by the contractor or the prime sponsor, as outlined in the attached procedure given to participants at intake.

J. Participant Allowance Payment System

Participants will be paid in accordance with prime sponsor policy for each hour of attendance in class, counseling, and/or other training-related acrivities, to be verified by time and attendance reports. The prime sponsor will handle all actual allowance payments through the Well-Known County payroll procedures.

Conclusion:

The information regarding contracting was taken from the U.S. Department of Labor Employment and Training Administration Technical Assistance Document - Sub-Agreement Development Handbook for CETA Prime Sponsors. The document is not available for wide distribution and is quite lengthly in its entirety (over 150 pages). We have attempted to extract the bare essentials for the purposes previously outlined.

However, the document also includes additional information regarding the contracting process, information on Methods of Procurement and the Request for Proposal Process, including sample budget and back-up forms, sample participant services schedules, sample assurances and certifications, sample basic agreement and individual referral forms; invoice for reimbursement; training program report, sample OJT contract forms, sample close-out package, and sample grievance procedure.

These items appear in the Sub-Agreement Development Handbook for CETA Prime Sponsors and may be requested from the prime sponsor in your area or through the Department of Labor regional office.

We hope this is helpful in better understanding CETA, dealing with your prime sponsor, developing a contract and most importantly serving citizens in your area.

G O O D L U C K !

JET
1/3/79

Pages 31-54, containing Supplementary Information and statistics regarding the Comprehensive Employment and Training Act taken from the Federal Register, Vol. 43, No. 244, Tuesday, December 19, 1978, have been deleted prior to the document's being submitted to the ERIC Document Reproduction Service.

UNIVERSITY OF CALIF.
LOS ANGELES

MAR 01 1979

CLEARINGHOUSE FOR
JUNIOR COLLEGES